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GEORGETOWN LAW
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April 5, 2018

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Re: *Modernization of Media Regulation Initiative*, MB Docket 17-105

Dear Ms. Dortch:

On April 5, 2018, Ariel Fox Johnson and Charlotte Fedders of Common Sense Media, and Angela Campbell, Chris Laughlin, and Kamila Benzina of Georgetown Law's Institute for Public Representation met with Commissioner Michael O'Rielly and Brooke Ericson of the FCC. The purpose of this meeting was to discuss how the FCC can better ensure the needs of children's media are met, in light of recent announcements that the children's television rules would be up for review.

The children's advocates generally raised concerns that loosening the current children's television requirements for broadcasters could lead to less quality children's programming, particularly for lower-income households who rely on broadcast television. While they recognize a changing media landscape and an increase in the quantity of children's programming online, they emphasized that not all children have access to these mediums. They highlighted that 28% of 0-to 8-year olds in lower income families do not have a home computer, 26% lack access to high-speed internet at home, and 39% do not have cable subscriptions.

They also cautioned against relying on online content, such as videos on YouTube Kids, as a substitute for the high quality programming broadcasters are currently required to provide. The children's advocates discussed the prevalence of inappropriate and commercialized content online, as well as a general lack of accountability for what is categorized as "children's" content online. They emphasized that more children's programming content does not necessarily mean better content, and urged the Commission to keep this in mind when reviewing the current standards for broadcasters.

They distributed Common Sense Media's 2017 report on children's media use, "The Common Sense Census: Media Use By Kids Age Zero To Eight," a copy of which is attached.

Respectfully Submitted,
/s/ Angela Campbell
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April 5, 2018

cc: Commissioner Michael O'Rielly
Brooke Ericson